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9 Attorneys for United States of America

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN JOSE DIVISION

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 VASILE MEREACRE,

17 Defendant.

) No. CR 18-00348 LHK (SVK)

) JOINT STIPULATION UPDATING THE COURT  
) REGARDING THE DEFENDANT'S TRAVEL TO  
) CANADA; [PROPOSED] ORDER

18  
19 On June 11, 2019, the Court granted the parties' stipulation allowing defendant Vasile Mereacre  
20 to travel from the Southern District of Florida to Toronto, Canada for the purpose of visiting with his  
21 family and receiving medical and dental treatment. Dkt. No. 35. The defendant traveled to the Greater  
22 Toronto Area, Ontario, Canada on June 13, 2019, and was scheduled to return to Florida today.  
23 However, he was unable to get on his returning flight by the United States by Customs and Border  
24 Protection ("CBP") because of the above-captioned criminal case and the fact that he did not possess a  
25 valid entry document. The defendant informed CBP that he was being supervised by Gary L. Hackett,  
26 Senior Pretrial Services Officer in the Southern District of Florida. A CBP officer contacted Officer  
27 Hackett to confirm his supervision and pending case in the Northern District of California.

28 In order to return to the United States, the defendant must obtain a document from CBP known

**FILED**

**JUL -9 2019**

SUSAN V. SOONG  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE

1 as a "Significant Public Benefit Parole." The Federal Bureau of Investigation is working with CBP to  
2 complete the paperwork to obtain the document, and undersigned counsel has been informed that it  
3 might take up to 30 days for the paperwork to be approved. Therefore, the parties request that the Court  
4 modify the defendant's pretrial release conditions as follows:

- 5 1. The defendant shall continue to reside with his parents at 3 Arthur Evans Crescent, Bradford,  
6 Ontario, Canada for up to 30 days from the date of this Order.
- 7 2. Once the defendant's travel document has been approved and issued by CBP, the defendant  
8 shall return to the Southern District of Florida within 48 hours.
- 9 3. The defendant will contact Pretrial Services Officer Hackett to keep him updated about his  
10 travel plans and follow any instructions.
- 11 4. The defendant shall report to Officer Hackett no later than 24 hours upon his return to the  
12 United States and shall surrender his passport to the United States District Court.
- 13 5. The parties will file a status memorandum with the Court after the defendant returns to the  
14 United States.

15 SO STIPULATED.

16 DATED: 7/8/19

Respectfully submitted,

17 DAVID L. ANDERSON  
18 United States Attorney

19 */s/ Susan Knight*

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21 SUSAN KNIGHT  
22 Assistant United States Attorney

*/s/ Doron Weinberg*

23 DATED: 7/8/19

24 \_\_\_\_\_  
25 DORON WEINBERG  
26 Counsel for Defendant Mereacre

1 ~~PROPOSED~~ ORDER

2 Based on good cause, IT IS HEREBY ORDERED that the conditions of defendant Vasile  
3 Mereacre's pretrial release be modified to allow him to remain with his family at 3 Arthur Evans  
4 Crescent, Bradford, Ontario, Canada while the U.S. Government obtains permission for him to return to  
5 to the Southern District of Florida.

6 The Court FURTHER ORDERS that the defendant shall return to the Southern District of  
7 Florida within 48 hours after his travel document has been issued by CBP. The defendant shall  
8 Contact Pretrial Services Officer Hackett and follow his instructions, and shall report to him in person  
9 no later than 24 hours upon his return to the United States. The defendant shall surrender his passport to  
10 the United States District Court at that time.

11 The COURT ORDERS the parties will file a status memorandum with the Court after the  
12 defendant returns to the United States.

13 SO ORDERED.

14 DATED: July 9, 2019

15   
16 HONORABLE VIRGINIA K. DEMARCHI  
17 United States Magistrate Judge  
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